

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YORKTOWN CENTRAL
SCHOOL DISTRICT,

Plaintiff,

-against-

MONSANTO COMPANY,
PHARMACIA CORPORATION,
PECORA CORPORATION and
JOHN DOES 1-20,

Defendants.

X

Civil Action No.: 07 - 8648
(SCR)

ECF CASE

MOTION TO ADMIT COUNSEL
PRO HAC VICE

X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Rafael Vergara, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Thomas M. Goutman
Firm Name: White and Williams LLP
Address: 1800 One Liberty Place
City/State/Zip: Philadelphia, PA 19103
Phone Number: (215) 864-7057
Fax Number: (215) 789-7557

Thomas M. Goutman is a member in good standing of the Bar of the States of


Court:
Pennsylvania Supreme Court

Admission date:
October 16, 1979

There are no pending disciplinary proceedings against Thomas Goutman in any State or Federal Court.

Date: March 4, 2008

Respectfully submitted,


Rafael Vergara (RV-4098)

White and Williams LLP
One Penn Plaza, Suite 1801
New York, New York 10119
Phone: 212-244-9500

*Attorneys for defendants Monsanto Company and
Pharmacia Corporation*

MAR 06 2008

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19/0

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**AFFIDAVIT OF RAFAEL
VERGARA IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

----- X
STATE OF NEW YORK)
)
COUNTY OF NEW YORK)

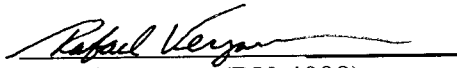
Rafael Vergara, being duly sworn, hereby deposes and says as follows:

1. I am an associate at White and Williams LLP, counsel for defendants Monsanto Company and Pharmacia Corporation in the above captioned action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set forth herein and in support of defendants Monsanto Company's and Pharmacia Corporation's motion to admit Thomas M. Goutman as counsel *pro hac vice* to represent defendants Monsanto Company and Pharmacia Corporation in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in the State of New York in 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Mr. Goutman is a partner at White and Williams LLP.
4. I have found Mr. Goutman to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of Thomas M. Goutman, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Thomas M. Goutman, *pro hac vice*, which is attached hereto as **Exhibit 1**.
7. Attached as **Exhibit 2** is a certificate of good standing, dated February 28, 2008, with respect to Mr. Goutman's admission "to the bar of the Commonwealth of Pennsylvania."

WHEREFORE, it is respectfully requested that the motion to admit Thomas M. Goutman, *pro hac vice*, to represent defendants Monsanto Company and Pharmacia Corporation in the above captioned matter, be granted.

Respectfully submitted,



Rafael Vergara (RV-4098)

White and Williams LLP

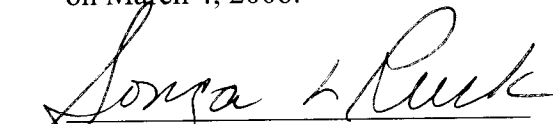
One Penn Plaza, Suite 1801

New York, New York 10119

Phone: 212-244-9500

*Attorneys for defendants Monsanto Company and
Pharmacia Corporation*

Subscribed and sworn to before me
on March 4, 2008.


Notary Public

SONGAL L. RUCK
Notary Public, State of New York
No. 01RU6011666
Qualified in Kings County
Commission Expires August 10, 2010

EXHIBIT 1

EXHIBIT 1

**THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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YORKTOWN CENTRAL
SCHOOL DISTRICT,

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ECF CASE

**ORDER FOR ADMISSION PRO
HAC VICE ON WRITTEN
MOTION**

----- X
Upon the motion of Rafael Vergara, attorney for defendants Monsanto Company and Pharmacia Corporation and said sponsor's attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Applicant's Name:	Thomas M. Goutman
Firm Name:	White and Williams LLP
Address:	1800 One Liberty Place
City/State/Zip:	Philadelphia, PA 19103
Phone Number:	(215) 864-7057
Fax Number:	(215) 789-7557
Email Address:	goutmant@whiteandwilliams.com

is admitted to practice pro hac vice as counsel for defendants Monsanto Company and Pharmacia Corporation in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF)

system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge

EXHIBIT 2

EXHIBIT 2



Supreme Court of Pennsylvania

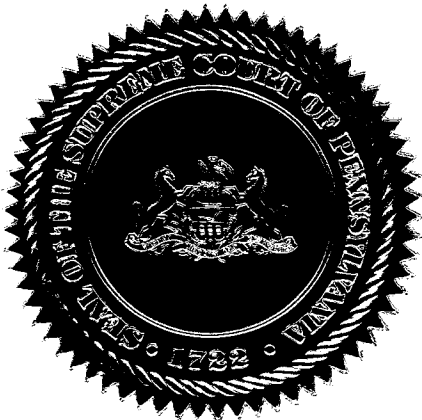
CERTIFICATE OF GOOD STANDING

Thomas Marsh Goutman, Esq.

DATE OF ADMISSION

October 16, 1979

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: February 28, 2008

A handwritten signature in black ink, appearing to read "John W. Person, Jr.", written over a horizontal line.

John W. Person, Jr., Esq.
Deputy Prothonotary

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SOUTHERN DISTRICT OF NEW YORK**

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CERTIFICATE OF SERVICE

----- X

I, Rafael Vergara, hereby certify, under penalty of perjury, that on **March 4, 2008**, I will cause to be sent a copy of (1) **Motion to Admit Counsel Pro Hac Vice** (dated March 4, 2008); and (2) **Affidavit of Rafael Vergara in Support of Motion to Admit Counsel Pro Hac Vice** (dated March 4, 2008), by **FedEx**, to the following persons:

Kevin J. Madonna, Esq.
KENNEDY & MADONNA, LLP
48 Dewitt Mills Road
Hurley, NY 12443

Michael Kozoriz, Esq.
White and Williams LLP
The Atrium – East 80 Route 4
Paramus, NJ 07652

Date: March 4, 2008

Respectfully submitted,



Rafael Vergara (RV-4098)

White and Williams LLP

One Penn Plaza, Suite 1801

New York, New York 10119

Phone: 212-244-9500

*Attorneys for defendants Monsanto Company and
Pharmacia Corporation*